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Admitted to Practice Law
in the State of New York

September 18, 2023

Via ECF

Hon. Lee G. Dunst, USMJ
United States District Court, EDNY
100 Federal Plaza
Central Islip, NY 11717

Re: Jonatan Barahona and Hector Hernandez v. Paradise Tree
Service & Landscape, Corp. and William Nieto
Venue: United States District Court, Eastern District of New York
Civil Action No.: 2:21-cv-05400 (GRB)(AYS)

Dear Judge Dunst:

Regarding the above matter, I represent the Defendants, Paradise Tree Service & Landscape, Corp. and William Nieto. I am writing this letter to request additional time to respond to Mr. Moser's letter motion submitted late Friday Afternoon on September 15, 2023. I request additional time to oppose the motion and cross-move for outstanding discovery and sanctions.

Respectfully submitted,



Glenn J. Ingoglia

c.c.: Via ECF
Plaintiffs' Counsel
Steven J. Moser, Esq.